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Subject: Airport EIR

Questions regarding the Airport EIR

1) PROJECT OBJECTIVE, Item 1.5

Why is the objective of this EIR to provide airport facilities which accommodate the "minimum" permitted number of flights and not the maximum (41 commercial & 25 commuter)? EIR's are used to evaluate the environmental implications of a maximized, proposed development...it seems the objective for this EIR is fallacious.

2) ENVIRONMENTALLY SUPERIOR ALTERNATIVE, Item 1.13

How can a +- 102,850 square foot (excluding parking structures and other facilities) terminal expansion of an airport, which is surrounded by residential neighborhoods, which were in existence prior to the commercialization of the airport, be an "environmentally superior" solution to: a) maintaining the existing facility with no new environmental impacts? or, b) providing a minimal increase in facilities to accommodate new TSA/security requirements?

3) ALTERNATIVE , Item 2.5.4

If Alternate C is unacceptable because of the loss of terminal parking spaces and need to address TSA requirements, then why was this alternate continued throughout the EIR and not replaced with a viable alternate? The viable alternate would simply address: TSA office space (1400 SF), non secure restrooms (850 SF), new Passenger Security Screening (2000 SF) and Baggage Screening (2000 SF) for a total of 8.850 SF of new addition? Replacement parking could be achieved with a City constructed Parking Structure, at much less expense to the citizens of Long Beach.

4) How will the existing airport, much less the proposed expansion, affect the 1400 new homes proposed north of the airport?

5) The Zoning Ordinance requires buildings to be sited to provide views, avoid a wall of buildings and encourage views to the Terminal Building. Parking structures should be articulated to avoid long uninterrupted horizontal and/or vertical lines, located to not disrupt any lines of sight to the Terminal Building and not exceed 43 feet high. The proposed parking structure along Donald Douglas Drive is the antithesis of these requirements. The structures improper siting, bulk and design is illustrated on Exhibits 2-4 and 3.1-3. It's patently obvious that it disrupts the views to the Terminal and is indeed a long, unarticulated wall, which exceeds the prescribed height (see last paragraph on page 3.1-8). How can this parking structure be an acceptable response to these important City requirements?

6) The first paragraph on page 3.1-4 states "the baggage claim area may be relocated and enlarged to accommodate an increase in space requirements related to an approved INCREASE in flights". Why is an increase in the baggage being proposed by this EIR if this EIR's objective is to accommodate the "minimum" number of flights?

7) IMPACT ANALYSIS 3.1.2

The project does substantially degrade the existing visual character of the site. See item 5 above. How can this EIR state otherwise?

The project does adversely impact views of the Terminal from the Street. See item 5 above. How can this EIR state otherwise?

The project does adversely impact views of the Terminal from the airfield. See the elevation study/view (eye level elevation) from the airfield which clearly demonstrates how the base of this building will be obscured by the proposed addition. How can this EIR state otherwise?

8) It's repeated, throughout the EIR, "The improvements to the Airport Terminal Area and Parcel O would be the same and would not be affected by an increase in flights". If this is so, then why is the development proposing more than a minimal expansion? It appears the proposal wants to over-build, anticipating an increase in flights. How can this EIR be supportive of this over-building which simply increases the environmental impacts and degradation to the surrounding community?

9) Why not demolish the existing parking structure, which is aesthetically detrimental to the existing airport character?

10) The "viewsheds" mentioned in the EIR, specifically with respect to the proposed parking structure, are erroneous and misleading. Why not provide more accurate representations on how this egregious structure will obscure the views to the Terminal?

11) On page 3.3-2 there are eleven criteria listed as City evaluators for a historical resource, although items H and I are repetitive. Therefore, which criteria is missing?

12) Per page 3.3-5, McDonnell Douglas Aircraft Co. was begun in 1940. Commercial flights began later, after most of the residential neighborhoods north and south of the airport were built-out, therefore, why should expansion of this airport be allowed to disrupt these predecessor neighborhoods?

13) Why doesn't the EIR discuss the implications of potential structural and aesthetic damage to the Terminal Building during construction i.e., installation of attached and adjacent foundations, heavy equipment operations, etc.?

14) Why on page 3.3-9 does the EIR state that the two story old air traffic control tower is "not considered a character-defining feature" ?

15) Why doesn't Table 3.5-1 list the schools, both north and south of the airport as sensitive receptors? Two of these schools, Longfellow Elementary and Hughes Middle School, suffer much more from noise and pollutants than the schools which are listed, within four kilometers, to the SIDES of the runways. Why doesn't the EIR take into consideration areas (take-offs and landings) that are more impacted by the airport, than simply drawing a radius around the airport? Why doesn't the sensitive receptor areas extend for 3-4 miles north and south of the airport?

16) If "Growth of the airport will be limited in order to protect surrounding residential neighborhoods....", then why is this EIR supportive of expansion beyond the minimal needs to satisfy TSA requirements?

17) Where is goal two for the City of Long Beach Strategic Plan 1020, listed on page 3.5-10?

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18) The EIR doesn't address SCAG's requirement: "Operations at Long Beach Airport shall be constrained to existing physical or legal capacity" why not?

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19) Item K on page 3.5-15 states " No portion of any site within the LB Airport Terminal Area shall be used in such a manner as to create a nuisance to an adjacent site, such as....sound,....air or water pollution, dust and emission or odorous toxic or noxious matter". If the Terminal Area supports the flying of airplanes, which create all of these nuisances for adjacent sites (neighborhoods), how can this EIR be approved?

} 19

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**COMMENTER 287    STEVE WRAIGHT**  
**Dated: January 30, 2006**

**Response 1**

Consistent with CEQA, the Draft EIR provides an analysis of the Proposed Project's potential environmental impacts. As stated on pages 2-7 and 2-8 of the DEIR, the Proposed Project provides improvements to the existing Airport Terminal Building and related facilities at the Airport in order to accommodate recent increases in flight activity at the Airport consistent with operational limitations of the Airport Noise Compatibility Ordinance and the 1995 Settlement Agreement. The terminal area improvements are being designed to accommodate the demand based on the *minimum* requirements of the Ordinance, which allows 41 daily commercial and 25 daily commuter airline flights.

It should be noted that many of the commenter's remarks are based upon a flawed understanding of the provisions in the Airport Noise Compatibility Ordinance. Specifically, the commenter appears to believe that the Ordinance establishes 41 daily commercial and 25 daily commuter flights as maximum limits. In fact, the Ordinance sets these flight levels as *minimums*. The commenter is, therefore, referred to Topical Response 3.1.1 for additional information regarding the Proposed Project and the relationship of the proposed improvements to increased flights and the Airport Noise Compatibility Ordinance.

**Response 2**

Refer to Topical Response 3.1.4 regarding the environmentally superior alternative.

**Response 3**

Refer to Topical Response 3.1.3 regarding the alternatives evaluated in the DEIR.

**Response 4**

The Douglas Park EIR evaluated the potential impact of current and future<sup>72</sup> Airport operations on the proposed new residences north of the Airport and provided that the residences will fall within an avigation easement. If built, the Douglas Park residences could be subject to the same potential inputs whether or not the airport terminal improvements are constructed. This is because the permitted number of flights will remain the same with or without the construction of the project.

**Response 5**

Refer to Topical Response 3.1.8 regarding the visual impacts associated with the Proposed Project, including the proposed parking structure.

**Response 6**

Refer to Topical Response 3.1.1 for information regarding the Proposed Project and the relationship of the proposed improvements to increased flights and the Airport Noise Compatibility Ordinance.

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<sup>72</sup> Flight levels consistent with the Airport Noise Compatibility Ordinance.

### **Response 7**

Refer to Topical Response 3.1.8 regarding the visual impacts associated with the Proposed Project.

### **Response 8**

Refer to Topical Response 3.1.1 for information regarding the Proposed Project and the relationship of the proposed improvements to increased flights and the Airport Noise Compatibility Ordinance.

### **Response 9**

Demolition of the existing parking structure would exacerbate the traffic and air quality impacts that are currently experienced at the Airport during peak periods, resulting in more significant impacts. Further, the existing structure is needed to accommodate existing demand.

### **Response 10**

Refer to Topical Response 3.1.8 regarding the visual impacts associated with the Proposed Project.

### **Response 11**

As the commenter notes, the list provided on page 3.3-2 of the DEIR is incomplete. The entire list of criteria that the City uses for designation of landmarks and landmark districts is as follows:

- A. It possesses a significant character, interest or value attributable to the development, heritage or cultural characteristics of the city, the southern California region, the state or the nation; or
- B. It is the site of a historic event with a significant place in history; or
- C. It is associated with the life of a person or persons significant to the community, city, region or nation; or
- D. It portrays the environment in an era of history characterized by a distinctive architectural style; or
- E. It embodies those distinguishing characteristics of an architectural type or engineering specimen; or
- F. It is the work of a person or persons whose work has significantly influenced the development of the city or the southern California region; or
- G. It contains elements of design, detail, materials, or craftsmanship which represent a significant innovation or
- H. It is a part of or related to a distinctive area and should be developed or preserved according to a specific historical, cultural or architectural motif; or
- I. It represents an established and familiar visual feature of a neighborhood or community due to its unique location or specific distinguishing characteristic; or

- J. It is, or has been, a valuable information source important to the prehistory or history of the city, the southern California region or the state; or
- K. It is one of the few remaining examples in the city, region, state or nation possessing distinguishing characteristics of an architectural or historical type; or
- L. In the case of the designation of a tree(s) based on historic significance, that the tree(s) is (are) associated with individuals, places and/or events that are deemed significant based on their importance to national, state and community history; or
- M. In the case of the designation of a tree(s) based on cultural contribution, that the tree(s) is (are) associated with a particular event or adds (add) significant aesthetic or cultural contribution to the community. (Ord. ORD-05-0026 § 1, 2005; Ord. C-6961 § (part), 1992).

It should be noted that CEQA Guidelines §15064.5 was used as the basis for determining whether implementation of the Proposed Project would result in a significant impact to historic resources (as stated on page 3.3-7).

## **Response 12**

Refer to Topical Response 3.1.1 for information regarding the Proposed Project and the relationship of the proposed improvements to increased flights and the Airport Noise Compatibility Ordinance.

## **Response 13**

Refer to Section 3.3, Cultural Resources, of the DEIR for a detailed discussion of the Proposed Project's potential impacts to historic resources. As stated on page 3.3-12,

“The Proposed Project would result in alterations to a designated landmark that would be considered significant. Development of the Proposed Project consistent with the Guiding Principles (Appendix B) and implementation of Mitigation Measures MM 3.3-1 through MM 3.3-6 and Standard Condition 3.3-3 would reduce the potentially significant impacts to a level considered less than significant.”

## **Response 14**

The tower portion of the building is not considered a character defining feature because it is not the original tower. The existing tower was constructed in 1958 and has been modified multiple times since it was constructed.

## **Response 15**

Although not required, the Draft EIR analyzed the Proposed Project's potential impacts to all sensitive receptors (including schools) within a four kilometer (2.6 mile) radius of the Airport. The environmental impact analysis for sensitive receptors is provided for all topical areas addressed in the DEIR (e.g., air quality, noise, hazardous and hazardous wastes, etc.).

## **Response 16**

The DEIR recognizes that currently the Airport is not fully implementing the minimum number of flights provided for by the Airport Noise Compatibility Ordinance. As the commuter flights are phased in there will be increased demand on the Airport facilities. Additionally, the existing facilities are only marginally serving the people using the Airport at this time. Currently during peak periods, the gates at the Airport are completely utilized. Holdroom spaces during peak periods are at capacity. Increases in the number of passengers would pose potential safety issues and the City's ability to meet fire and safety codes would be compromised. Additionally, the Transportation Security Administration (TSA) has indicated that they need permanent, covered facilities to properly do the challenging job entrusted to them under the Aviation and Transportation Security Act. Additionally, there is desire to enhance the facilities by having one unified design rather than the clutter of various trailers used as temporary holdrooms and tents that have been set up to provide cover for security screening.

## **Response 17**

Goal 2, *Create a Work Force Development Plan to Promote Better Jobs and Wages*, is not listed because it is not relevant to the Proposed Project.

## **Response 18**

With respect to consistency with regional planning documents, it should be noted that the Proposed Project would not change the flight assumptions for Long Beach Airport used in the planning documents. The Regional Transportation Plan reflects the 41 commercial flights and 25 commuter flights. There is a variance in the calculation of the number of passengers projected. Passenger levels are associated with the 41 minimum air carrier and 25 minimum commuter flights. The difference between the 3.8 MAP and the 4.2 MAP reflects an updated calculation based on aircraft used and load factors. Mike Armstrong, with SCAG's Planning and Policy Department, identified this as a technical refinement, rather than inconsistency. As indicated in the SCAG's response to the NOP and the DEIR, SCAG did not identify the Proposed Project as a regionally significant project (see Commenter 5).

## **Response 19**

The Proposed Project would not result in any new uses at the Airport, rather it would improve current conditions at the Airport. Refer to Topical Response 3.1.1 regarding the project description.